

STATE OF INDIANA)
COUNTY OF MARION)

IN THE MARION SUPERIOR COURT
CAUSE NO.

STATE OF INDIANA

Plaintiff,

V.

AYLO FREESITES, LTD.,
AYLO PREMIUM LTD.,
AYLO GROUP LTD.,
AYLO TECHNOLOGIES LTD.,
AYLO HOLDINGS S.A.R.L.,
AYLO MEDIA S.A.R.L.,
9279-2738 QUEBEC INC.,
9219-1568 QUEBEC INC.,
AYLO HOLDINGS USA CORP.,
AYLO BILLING US CORP.,
AYLO GLOBAL ENTERTAINMENT INC.,
TOQON, LLC,
AYLO GLOBAL ENTERTAINMENT
(EUROPE) LTD.,
FTSA, LLC,
AYLO USA INCORPORATED,
AYLO BILLING LTD.,
AYLO SOCIAL LTD.,
DONORMASS LTD., and
ETHICAL CAPITAL PARTNERS LTD.,

Defendants.

JURY TRIAL DEMANDED

COMPLAINT FOR INJUNCTION, CIVIL PENALTIES, AND COSTS

Plaintiff, the State of Indiana (the “State”), appearing through Attorney General Theodore E. Rokita (“Attorney General”), by Deputy Attorneys General Douglas S. Swetnam, Jennifer M. Van Dame, Alyssa A. Rogers, Jackson K. Yerkes, and Joseph D. Deiser, bring this action against Aylo Freesites, Ltd. (“Aylo Freesites”), Aylo Premium Ltd. (“Aylo Premium”), Aylo Group Ltd. (“Aylo Group”), Aylo Technologies Ltd. (“Aylo Technologies”), Aylo Holdings S.A.R.L (“Aylo Holdings”), Aylo Media S.A.R.L. (“Aylo Media”), 9279-2738 Quebec Inc. (“9279-2738 Quebec”),

9219-1568 Quebec Inc. (“9219-1568 Quebec”), Aylo Holdings USA Corp. (“Aylo Holdings USA”), Aylo Billing US Corp. (“Aylo Billing US”), Aylo Global Entertainment Inc. (“Aylo Global Entertainment”), Toqon, LLC (“Toqon”), Aylo Global Entertainment (Europe) Ltd., FTSA, LLC, Aylo USA Incorporated, Aylo Billing Ltd., Aylo Social Ltd. (“Aylo Social”), Donormass Ltd. (“Donormass”), and Ethical Capital Partners Ltd. (“Ethical Capital Partners”) (collectively “Defendants” or “Aylo”), for violations of Ind. Code § 24-4-23-1 *et seq.* (“Indiana’s Age Verification Law”), and Ind. Code § 24-5-0.5-1 *et seq.* (“Indiana Deceptive Consumer Sales Act” or “DCSA”). The State brings this action for injunctive relief, civil penalties, and recovery of costs incurred to investigate and maintain the action. In support thereof, Plaintiff alleges the following:

I. INTRODUCTION

1. Online pornographic material has never been more accessible than it is today. The abundance of internet pornography combined with the almost unlimited access that minors have to pornographic websites raises serious concerns about the long-term effects of minors viewing sexually explicit material.

2. Pornographic content emphasizes extreme forms of obscenity, including sexual violence, choking, rape fantasies, sex slavery, and sex with teen girls. Indeed, one study found that forty-five percent of Pornhub.com¹ scenes contained aggression, including spanking, gagging, slapping, hair pulling, and choking, with women as the

¹ Pornhub.com is owned and operated by Defendants.

target of the physical aggression in ninety-seven percent of scenes.²

3. Evidence shows that minors are accessing this material in large numbers. The average age of first exposure to internet pornography is eleven,³ and by age eighteen, more than seventy-two percent of adolescents (and more than ninety percent of boys) say they have viewed pornography online.⁴

4. Adolescent exposure to pornography carries severe physical and psychological harms.⁵ It makes boys more likely to perpetrate sexual violence and girls more likely to be sexually victimized.⁶ It promotes unhealthy beliefs about sexual relationships, leads to earlier and riskier sexual experiences, negatively affects social integration and mental health, and causes behavioral problems.⁷ It also encourages adolescents to create, send, and share child sexual abuse material as sexually explicit images and recordings of themselves (sexting).⁸

5. Despite these known harms to minors, the Defendants' websites are pumping enormous amounts of pornographic content onto the internet, where minors can and do freely access it. In 2019 alone, Pornhub reported forty-two billion visits to

² Niki Fritz et al., *A Descriptive Analysis of the Types, Targets, and Relative Frequency of Aggression in Mainstream Pornography*, 49 ARCHIVES OF SEXUAL BEHAV. 3041, 3041 (2020).

³ Byrin Romney, *Screens, Teens, and Porn Scenes: Legislative Approaches to Protecting Youth from Exposure to Pornography*, 45 VT. L. REV. 43, 48 (2020).

⁴ Chiara Sabina et al., *The Nature and Dynamics of Internet Pornography Exposure for Youth*, 11 CYBERPSYCHOLOGY & BEHAV. 1, 1 (2008).

⁵ Byrin Romney, *Screens, Teens, and Porn Scenes: Legislative Approaches to Protecting Youth from Exposure to Pornography*, 45 VT. L. REV. 43, 54-55 (2020).

⁶ *Id.*

⁷ *Id.* at 53.

⁸ *Id.* at 56-57.

its site, 1.36 million hours (169 years) of new uploaded content, and 6,597 petabytes of data transferred (easily more bandwidth than the entire internet consumed in 2002).⁹ Unlike the dirty magazines and VHS tapes of yesteryear, pornography today consists of high-definition videos that are affordable to access (Pornhub is mostly free), available from virtually any device without restriction, and depict unlimited sexual content, including risky or illegal sexual practices.¹⁰

6. In response to this problem, the Indiana General Assembly enacted Senate Bill 17 to require age verification before an individual accesses material harmful to minors online. 2024 Ind. Legis. Serv. P.L. 98-2024 (S.E.A. 17), codified at Ind. Code § 24-4-23-1 *et seq.*. Indiana’s Age Verification Law applies to any “[a]dult oriented web-site,” defined as “a publicly accessible website that publishes material harmful to minors, if at least one-third (1/3) of the images and videos published on the website depict material harmful to minors.” Ind. Code § 24-4-23-1. The law prohibits operators of these websites from “knowingly and intentionally publish[ing] an adult oriented website unless the adult oriented website operator uses a reasonable age verification method to prevent a minor from accessing the adult oriented website.” Ind. Code § 24-4-23-10.

7. Defendants are not in compliance with Indiana’s Age Verification Law. Accordingly, the State of Indiana, through Attorney General Todd Rokita, brings this

⁹ *Id.* at 50.

¹⁰ Aina M. Gassó & Anna Bruch-Granados, *Psychological and Forensic Challenges Regarding Youth Consumption of Pornography: A Narrative Review*, 1 ADOLESCENTS 108, 108–09 (2021).

action against Defendants to redress and restrain violations of Indiana’s Age Verification Law. The State seeks an order permanently enjoining Defendants’ conduct challenged herein, imposing civil penalties, and providing all other monetary and equitable relief to which the State is entitled.

8. Defendants’ violations of law extend beyond noncompliance with Indiana’s Age Verification Law. Defendants have a history of misrepresenting to Indiana consumers its efforts to limit child-sex abuse material (“CSAM”) and nonconsensual material (“NCM”) in violation of the Indiana Deceptive Consumer Sales Act.

9. From 2020 to 2023, Defendants allowed the upload of at least eleven million videos and photos without verifying the identities and consent of all the individuals in the videos and photos.¹¹

10. As recently as 2024, Defendants claimed that “zero” underage content was available on Pornhub.com,¹² despite thousands of reports of CSAM reported each year on Pornhub.com to the National Center for Missing and Exploited Children.¹³

11. Defendants’ misrepresentations to Indiana consumers regarding the extent to which CSAM and NCM are available on its websites and Defendants’ failure to actually limit such material constitute unfair, abusive, and deceptive acts,

¹¹ See *Pornhub Transparency Reports*, <https://help.pornhub.com/hc/en-us/sections/5357288459027-Transparency-Reports>.

¹² *130 Million Daily Users” - PornHub Owner On Moderation, Sex Work & Morality*, PBD Podcast Ep. 484 (Oct. 4, 2024), available at <https://www.youtube.com/watch?v=CPi5WncPDak>.

¹³ See *Pornhub Transparency Reports*, <https://help.pornhub.com/hc/en-us/sections/5357288459027-Transparency-Reports>.

omissions, and practices.

12. Moreover, Defendants' misrepresentations regarding the extent to which Indiana residents, including Indiana minors, could continue to access adult oriented websites after passage of Indiana's Age Verification Law were unfair, abusive, and deceptive. Rather than implement any form of reasonable age verification for its websites, Defendants represented to Indiana consumers, including Hoosier parents, that they had "completely disable[d] access to our website[s] in Indiana."¹⁴ However, Defendants have publicly admitted they know that Virtual Private Networks (VPNs), proxies, and location spoofing software may be used to continue to access Defendants' websites in Indiana.

13. Defendants' misrepresentations to Indiana consumers, particularly parents, regarding the extent to which their adult oriented websites continue to be available to minors in Indiana constitute unfair, abusive, and deceptive acts, omissions, and practices.

14. Accordingly, the State of Indiana, through Attorney General Todd Rokita, brings this consumer protection action against Defendants to redress and restrain violations of the Indiana Deceptive Consumer Sales Act, Ind. Code § 24-5-0.5, *et seq.* The State seeks an order permanently enjoining Defendants' conduct challenged herein, imposing civil penalties, and providing all other monetary and

¹⁴ See, e.g., "Dear user" message, <https://www.pornhub.com> (last accessed Nov. 29, 2025) (emphasis added), accord "Dear user" message, <https://www.redtube.com> (last accessed Nov. 29, 2025) & "Dear user" message, <https://www.youporn.com> (last accessed Nov. 29, 2025).

equitable relief to which the State is entitled.

II. THE PARTIES

15. The Attorney General is authorized to bring actions on behalf of the State of Indiana pursuant to Ind. Code § 4-6-3-2.

16. The Attorney General is authorized to bring actions to enforce Indiana's Age Verification Law pursuant to Ind. Code § 24-4-23-15.

17. The Attorney General is authorized to bring actions to enforce the Indiana Deceptive Consumer Sales Act pursuant to Ind. Code § 24-5-0.5-4.

18. Defendant Aylo Freesites Ltd. (formerly known as MG Freesites Ltd.) is a Cypriot corporation with its principal office or place of business at Block 1, 195-197 Old Nicosia-Limassol Road, Dali Industrial Zone 2540, Cyprus. Defendant Aylo Freesites Ltd. transacts or has transacted business in and throughout Indiana. At all times relevant to this Complaint, acting alone or in concert with others, Defendant Aylo Freesites Ltd. has advertised, marketed, distributed, offered, provided, or sold pornographic content to consumers in Indiana.

19. Defendant Aylo Premium Ltd. (formerly known as MG Premium Ltd.) is a Cypriot corporation with its principal office or place of business at Block 1, 195-197 Old Nicosia-Limassol Road, Dali Industrial Zone 2540, Cyprus. Defendant Aylo Premium Ltd. transacts or has transacted business in and throughout Indiana. At all times relevant to this Complaint, acting alone or in concert with others, Defendant Aylo Premium Ltd. has advertised, marketed, distributed, offered, provided, or sold pornographic content to consumers in Indiana.

20. Aylo Group Ltd. (formerly known as MG CY Holdings Ltd.) is a Cypriot corporation with its principal office or place of business at Block 1, 195-197 Old Nicosia-Limassol Road, Dali Industrial Zone 2540, Cyprus. Defendant Aylo Group Ltd. transacts or has transacted business in and throughout Indiana. At all times relevant to this Complaint, acting alone or in concert with others, Defendant Aylo Group Ltd. has advertised, marketed, distributed, offered, provided, or sold pornographic content to consumers in Indiana.

21. Defendant Aylo Technologies Ltd. (formerly known as MG Technologies Ltd.) is a Cypriot corporation with its principal office or place of business at Block 1, 195-197 Old Nicosia-Limassol Road, Dali Industrial Zone 2540, Cyprus. Defendant Aylo Technologies Ltd. transacts or has transacted business in and throughout Indiana. At all times relevant to this Complaint, acting alone or in concert with others, Defendant Aylo Technologies Ltd. has advertised, marketed, distributed, offered, provided, or sold pornographic content to consumers in Indiana.

22. Defendant Aylo Holdings S.A.R.L. is a Luxembourg corporation with its principal office or place of business at 46, Grand Rue 1660 Luxembourg. Defendant Aylo Holdings S.A.R.L. transacts or has transacted business throughout Indiana. At all times relevant to this Complaint, acting alone or in concert with others, Defendant Aylo Holdings S.A.R.L. has advertised, marketed, distributed, offered, provided, or sold pornographic content to consumers in Indiana.

23. Defendant Aylo Media S.A.R.L. is a Luxembourg corporation with its principal office or place of business at 46, Grand Rue 1660 Luxembourg. Defendant

Aylo Holdings S.A.R.L. transacts or has transacted business in and throughout Indiana. At all times relevant to this Complaint, acting alone or in concert with others, Defendant Aylo Holdings S.A.R.L. has advertised, marketed, distributed, offered, provided, or sold pornographic content to consumers in Indiana.

24. Defendant 9279-2738 Quebec Inc. is a Canadian corporation with its principal office or place of business at 777 Decarie Boulevard, Suite 300, Montreal, Quebec, H4P 2H2, Canada. Defendant 9279-2738 Quebec Inc. transacts or has transacted business in and throughout Indiana. At all times relevant to this Complaint, acting alone or in concert with others, Defendant 9279-2738 Quebec Inc. has advertised, marketed, distributed, offered, provided, or sold pornographic content to consumers throughout Indiana.

25. Defendant 9219-1568 Quebec Inc. is a Canadian corporation with its principal office or place of business at 777 Decarie Boulevard, Suite 300, Montreal, Quebec, H4P 2H2, Canada. Defendant 9219-1568 Quebec Inc. transacts or has transacted business in and throughout Indiana. At all times relevant to this Complaint, acting alone or in concert with others, Defendant 9219-1568 Quebec Inc. has advertised, marketed, distributed, offered, provided, or sold pornographic content to consumers throughout Indiana.

26. Defendant Aylo Holdings USA Corp. (formerly known as MG Holdings USA Corp.) is a Delaware corporation with its principal office or place of business at 21800 Oxnard Street, Suite 150, Woodland Hills, California 91367. Defendant Aylo Holdings USA Corp. transacts or has transacted business in and throughout Indiana.

At all times relevant to this Complaint, acting alone or in concert with others, Defendant Aylo Holdings USA Corp. has advertised, marketed, distributed, offered, provided, or sold pornographic content to consumers throughout Indiana.

27. Defendant Aylo Billing US Corp. (formerly known as MG Billing US Corp.) is a Delaware corporation with its principal office or place of business at 21800 Oxnard Street, Suite 150, Woodland Hills, California 91367. Defendant Aylo Billing US Corp. transacts or has transacted business in and throughout Indiana. At all times relevant to this Complaint, acting alone or in concert with others, Defendant Aylo Billing US Corp. has advertised, marketed, distributed, offered, provided, or sold pornographic content to consumers throughout Indiana.

28. Defendant Aylo Global Entertainment (formerly known as MG Global Entertainment Inc.) is a Delaware corporation with its principal office or place of business at 21800 Oxnard Street, Suite 150, Woodland Hills, California 91367. Defendant Aylo Global Entertainment Inc. transacts or has transacted business in and throughout Indiana. At all times relevant to this Complaint, acting alone or in concert with others, Defendant Aylo Global Entertainment Inc. has advertised, marketed, distributed, offered, provided, or sold pornographic content to consumers throughout Indiana.

29. Defendant Toqon, LLC is a Delaware limited liability company with its principal office or place of business at 21800 Oxnard Street, Suite 150, Woodland Hills, California 91367. Defendant Toqon, LLC transacts or has transacted business in and throughout Indiana. At all times relevant to this Complaint, acting alone or in

concert with others, Defendant Toqon, LLC has advertised, marketed, distributed, offered, provided, or sold pornographic content to consumers throughout Indiana.

30. Defendant Aylo Global Entertainment (Europe) Ltd. (formerly known as MG Global Entertainment (Europe) Limited) is an English limited liability company with its principal office or place of business at London (W1w 5pf) Office 167-169 Great Portland Street, 5th Floor, London, United Kingdom, W1W 5pf. Defendant Aylo Global Entertainment (Europe) Ltd. transacts or has transacted business in and throughout Indiana. At all times relevant to this Complaint, acting alone or in concert with others, Defendant Aylo Global Entertainment (Europe) Ltd. has advertised, marketed, distributed, offered, provided, or sold pornographic content to consumers throughout Indiana.

31. Defendant FTSA, LLC, is a Delaware limited liability company with its principal place of business at 21800 Oxnard Street, Suite 150, Woodland Hills, California 91367. Defendant FTSA, LLC transacts or has transacted business in and throughout Indiana. At all times relevant to this Complaint, acting alone or in concert with others, Defendant FTSA, LLC has advertised, marketed, distributed, offered, provided, or sold pornographic content to consumers throughout Indiana.

32. Defendant Aylo USA Incorporated (formerly known as MindGeek USA Incorporated) is a Delaware corporation with its principal office or place of business at 21800 Oxnard Street, Suite 150, Woodland Hills, California 91367. Defendant Aylo USA Incorporated transacts or has transacted business in and throughout Indiana. At all times relevant to this Complaint, acting alone or in concert with others,

Defendant Aylo USA Incorporated has advertised, marketed, distributed, offered, provided, or sold pornographic content to consumers in Indiana.

33. Defendant Aylo Billing Limited (formerly known as MG Billing Limited) is an Irish corporation with its principal place of business at 24-26 City Quay, Dublin 2, Ireland. Defendant Aylo Billing Limited transacts or has transacted business in and throughout Indiana. At all times relevant to this Complaint, acting alone or in concert with others, Defendant Aylo Billing Limited has advertised, marketed, distributed, offered, provided, or sold pornographic content to consumers throughout Indiana.

34. Defendant Aylo Social Ltd. is a Cypriot corporation with its principal office or place of business at Block 1, 195-197 Old Nicosia-Limassol Road, Dali Industrial Zone 2540, Cyprus. Defendant Aylo Social Ltd. transacts or has transacted business in and throughout Indiana. At all times relevant to this Complaint, acting alone or in concert with others, Defendant Aylo Social Ltd. has advertised, marketed, distributed, offered, provided, or sold pornographic content to consumers throughout Indiana.

35. Defendant Donormass Limited is a Cypriot corporation with its principal office or place of business at Block 1, 195-197 Old Nicosia-Limassol Road, Dali Industrial Zone 2540, Cyprus. Defendant Donormass Limited transacts or has transacted business in and throughout Indiana. At all times relevant to this Complaint, acting alone or in concert with others, Defendant Donormass Limited has advertised, marketed, distributed, offered, provided, or sold pornographic content to

consumers in Indiana.

36. Defendant Ethical Capital Partners Ltd. is a Canadian limited liability company headquartered at 251 Laurier Ave. W., Suite 1050, Ottawa, ON K1P 5J6. Defendant Ethical Capital Partners Ltd. transacts or has transacted business in and throughout Indiana. At all times relevant to this Complaint, acting alone or in concert with others, Defendant Ethical Capital Partners Ltd. has advertised, marketed, distributed, offered, provided, or sold pornographic content to consumers in Indiana.

III. JURISDICTION AND VENUE

37. Defendants are subject to the jurisdiction of an Indiana court because the exercise of jurisdiction would not be inconsistent with the United States Constitution. Ind. Trial R. 4.4(A).

38. Defendants submitted to the jurisdiction of Indiana courts by suing the State to enjoin Indiana's Age Verification Law in *Free Speech Coalition, Inc. v. Rokita*, Case No. 1:24-cv-980 in the United States District Court for the Southern District of Indiana.

39. Defendants are subject to the jurisdiction of an Indiana court pursuant to Ind. Trial R. 4.4(A)(1) because this action arises from Defendants' business activities in Indiana, including but not limited to advertising, marketing, distributing, offering, providing, and selling adult oriented websites and pornographic content to Indiana residents.

40. Defendants are subject to the jurisdiction of an Indiana court pursuant to Ind. Trial Rule 4.4(A)(2)-(3) because: (a) this action arises from Defendants causing

injury in Indiana by failing to implement reasonable age verification measures to prevent minors in Indiana from accessing harmful sexual materials; and (b) Defendants regularly do or solicit business or engage in other persistent courses of conduct, or derive substantial revenue or benefit from goods, materials, or services used, consumed, or rendered in Indiana, including but not limited to advertising, marketing, distributing, offering, providing, and selling adult oriented websites and pornographic content to Indiana residents.

41. Defendants are further subject to the jurisdiction of an Indiana court pursuant to Ind. Trial Rule 4.4(A)(2)-(3) because: (a) this action arises from Defendants deceptively and unfairly misleading Indiana consumers, including Hoosier parents, regarding the ability of Indiana minors to access its adult oriented websites, and about its efforts to limit CSAM and NCM on its adult oriented websites; and (b) Defendants regularly do or solicit business or engage in other persistent courses of conduct, or derive substantial revenue or benefit from goods, materials, or services used, consumed, or rendered in Indiana, including but not limited to advertising, marketing, distributing, offering, providing, and selling adult oriented websites and pornographic content to Indiana residents.

42. As evidence of Defendants' continuous contacts with Indiana, Defendants included Indiana and Indiana-specific data in Pornhub's Insights articles from 2014-2025, including the Valentine's Day 2025 study, Super Bowl 2025 study,

and various Pornhub Year in Review surveys.¹⁵

43. Moreover, although Defendants have supposedly been restricting access in Indiana by blocking Indiana IP addresses since around June 27, 2024, Defendants know that its adult oriented websites continue to be accessible by consumers located in Indiana, and Defendants continue to track those Indiana users. On February 14, 2025, Defendants posted a Valentine's Day 2025 graphic showing Pornhub's top relative searches in certain states, which included Indiana:

¹⁵ Defendants' Pornhub Insights articles are "research and analysis directly from the Pornhub team" in which Defendants compile "data from billions of hits, all to explore the intricacies of online porn viewership." Defendants publish statistics on users' pornography viewership habits, including the most searched terms in a particular year, the top relative search terms by state, the most used browser for viewing pornography, the most used gaming consoles for viewing pornography, the most used device for viewing pornography, and how events like the 2024 United States Presidential Election or the 2025 Super Bowl affect users' viewing habits in different states, amongst others. *See Pornhub Insights*, <https://www.pornhub.com/insights>.

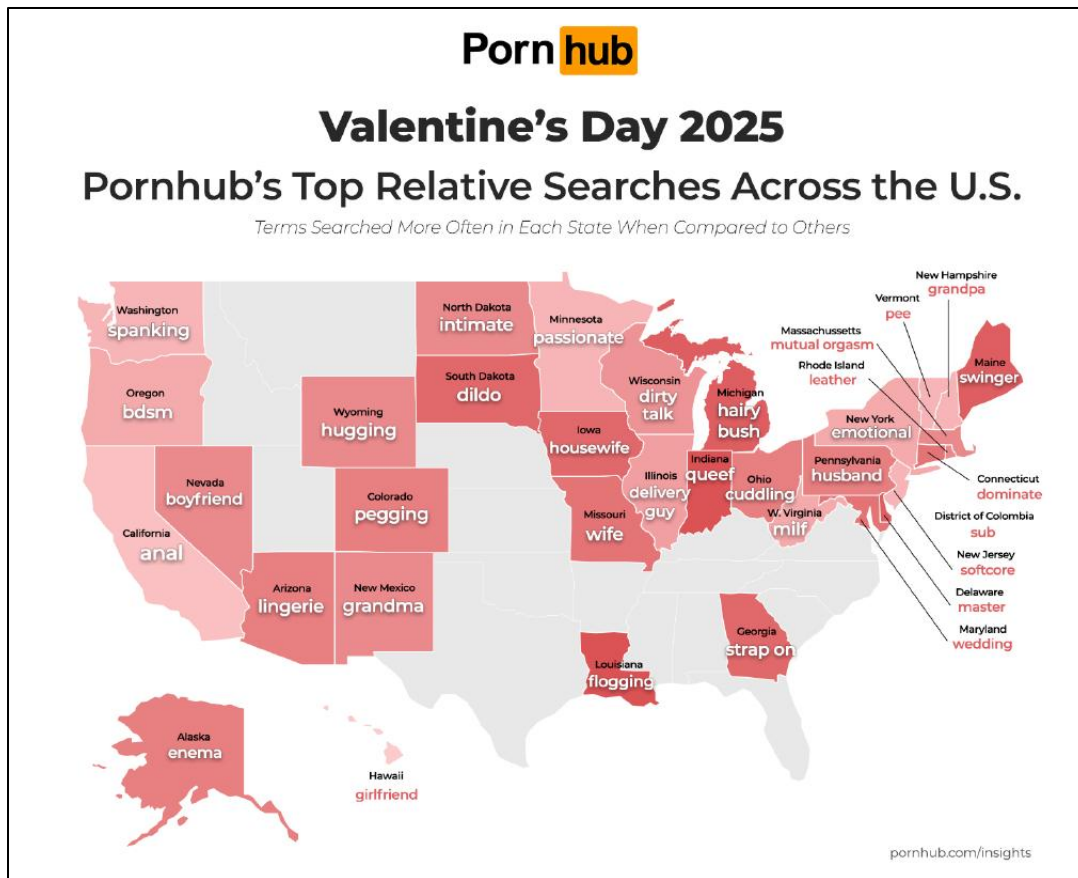


Figure 1¹⁶

44. Likewise, on Super Bowl Sunday in 2025, Defendants posted a graphic showing the percent change in Pornhub traffic during the Super Bowl compared to an average Sunday, which again included Indiana-specific data:

¹⁶ *Valentine's Day Searches 2025* (Feb. 14, 2025), <https://www.pornhub.com/insights/valentines-day-2025>.

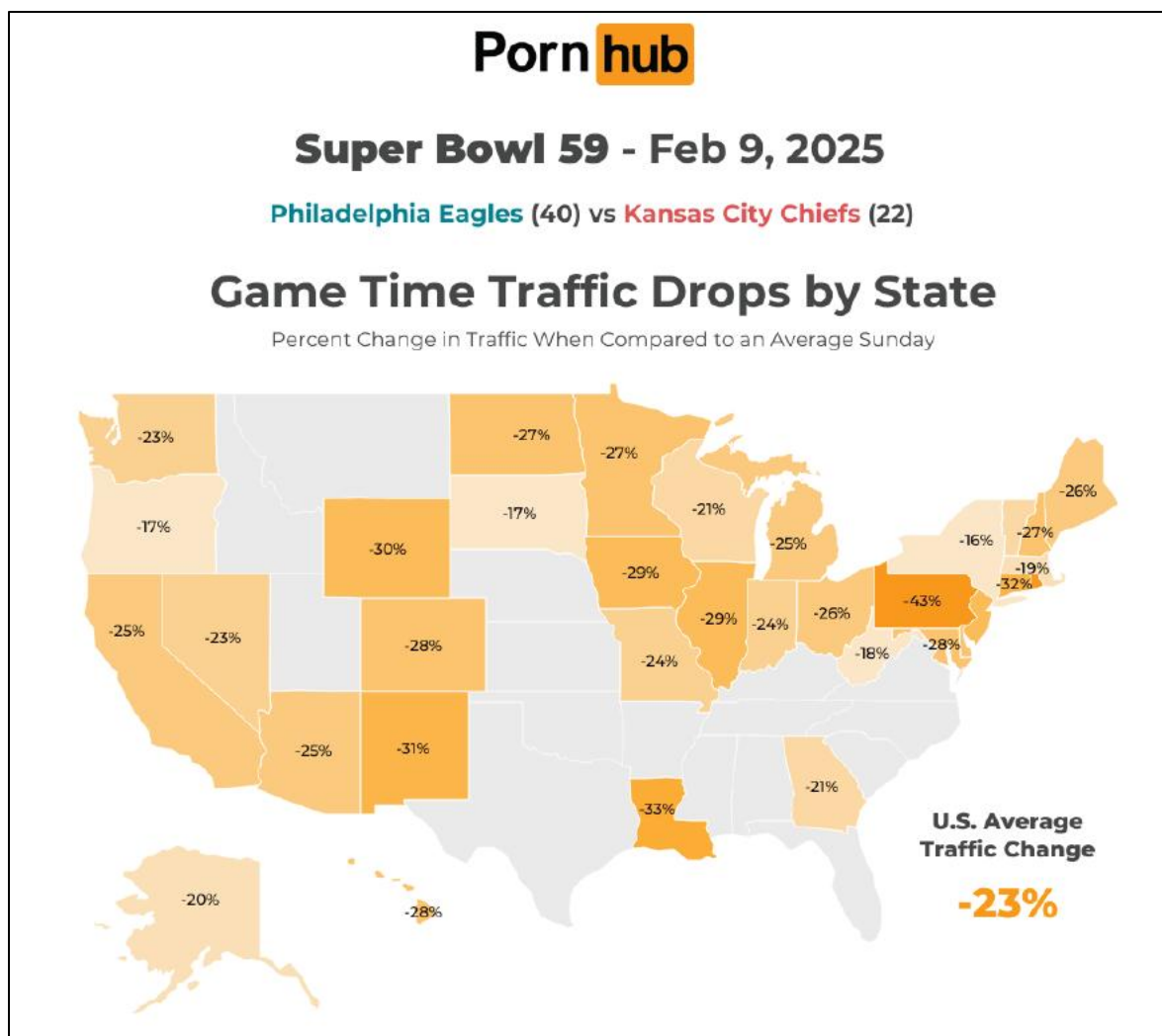


Figure 2¹⁷

IV. CORPORATE STRUCTURE

45. Defendants have operated as corporate “alter egos” of one another while engaging in the unlawful acts alleged below. In particular, Defendants work jointly to carry out the business practices described below, namely owning and operating their adult oriented websites, through an interrelated network of companies that

¹⁷ *Super Bowl Sunday 2025* (Feb. 11, 2025), <https://www.pornhub.com/insights/super-bowl-2025>.

have common control and ownership; shared officers, managers, employees, business functions, office space, and email systems; unified advertising; and commingled funds. Because Defendants have operated as corporate alter egos, each of them is liable for the acts and practices alleged below.

46. Aylo holds itself out to the public as a single global company operating under the Aylo brand.

47. Aylo uses common corporate names, including: Aylo holdings S.A.R.L, Aylo Freesites, LTD. Aylo Group LTD., and Aylo Premium Ltd. Defendant 9219-1568 Québec Inc. also does business as “Aylo Services” and “Aylo TM”.

48. Prior to referring to themselves as “Aylo”, Defendants operated under the brand name “MindGeek” or “MG”. For example, Aylo Holdings was known as “MG Holdings”. Aylo Freesites was “MG Freesites”, and Aylo Premium was “MG Premium”. When MindGeek became “Aylo”, Defendants rebranded their individual names to align with the new “Aylo” brand.¹⁸

49. Aylo also shares common principal officers, directors, and employees. Aylo Freesites Ltd, Aylo Premium Ltd., Aylo Group Ltd., Aylo Billing Ltd., Aylo Social Ltd., Aylo Technologies Ltd., (the Cyprus companies); Aylo Holdings S.A.R.L., Aylo Media S.A.R.L. (the Luxembourg companies); and 9219-1568 Québec Inc. and 9279-2738 Quebec Inc. (the Canadian companies) share common directors.

50. When Ethical Capital Partners acquired Aylo (then-MindGeek), Aylo’s

¹⁸ *MindGeek Becomes Aylo* (Aug. 17, 2023), <https://www.aylo.com/newsroom/mindgeek-becomes-aylo>.

press release stated: “Ethical Capital Partners (ECP), a private equity firm managed by a multidisciplinary team with regulatory, law enforcement, public engagement and finance experience, today announced that it has acquired MindGeek, a technology and media company, owner of a large portfolio of adult entertainment properties, including Pornhub, YouPorn, Redtube, Brazzers, Men.com, Sean Cody, Trans Angels and Nutaku.”¹⁹

51. The bottom of Aylo.com states: “Aylo is an ECP company.” Embedded in that statement is a hyperlink to EthicalCapitalPartners.com.²⁰ All of the stories published on the news tab on EthicalCapitalPartners.com relate to Aylo or MindGeek. Four of the six press releases published on EthicalCapitalPartners.com are nearly identical to press releases on Aylo.com.²¹

52. On August 17, 2023, in a press release titled, “MindGeek Becomes Aylo”, Aylo stated:

MindGeek, a technology and media company, owner of a large portfolio of adult entertainment properties, including Pornhub, Brazzers, Men.com, Trans Angels and Nutaku, is excited to announce its corporate rebrand and name change, driven by the valuable input from its dedicated employees, stakeholders and ownership group. The decision to rebrand the company as Aylo, comes in response to the need for a fresh start and a renewed commitment to innovation, diverse and inclusive adult content, and trust and safety.

Launched in 2004, the company has grown considerably, becoming an industry leader and tech pioneer. This growth, and the company’s newest chapter under the ownership of Ethical Capital Partners (ECP),

¹⁹ *ECP Announces Acquisition of MindGeek, Parent Company of Pornhub* (Aug. 17, 2023), <https://www.aylo.com/newsroom/ecp-announces-acquisition-of-mindgeek-parent-company-of-pornhub/>.

²⁰ See <https://www.aylo.com/> (last accessed Dec. 2, 2025).

²¹ See <https://www.ethicalcapitalpartners.com/news> (last accessed Dec. 2, 2025).

meant that it was time for a new brand that aligns with the employees' values and aspirations.

53. Aylo's website states that it is "Home to globally renowned adult entertainment brands." On the same webpage, Aylo lists its brands. Under "Premium Pay Sites", Aylo's website lists Brazzers, Reality Kings, digitalplayground.com, Twistys, MOFOS, MEN.COM, Realitydudes, and Seancody.com. On the same webpage, it lists under "Video Sharing Platforms" Pornhub, Youporn, Redtube, and Tube8. Under "Advertising Network" on the same webpage, it lists TrafficJunky and Adult Force. By listing brands that are operated by both Aylo Freesites and Aylo Premium together on the same website, Aylo acknowledges that Aylo Premium and Aylo Freesites are alter egos of one another.²²

54. Similarly, Aylo's LinkedIn page states: "Aylo holds a number of widely popular and diverse online adult entertainment and gaming properties. Its portfolio includes Pornhub, YouPorn, Brazzers, Men.com, Nutaku, and more, all of which maintain robust trust and safety protocols."²³ Noticeably, the listed brands again include websites from both Aylo Premium and Aylo Freesites: Pornhub.com (Aylo Freesites), Brazzers.com (Aylo Premium), Men.com (Aylo Premium).

55. Aylo's contact page available on the same Aylo.com website lists offices in Nicosia, Cyprus; Montreal, Canada; Luxembourg; London; and Austin, Texas.

56. The locations correspond to offices used by different Aylo entities:

²² *Home to globally renowned adult entertainment brands*, <https://www.aylo.com/brands/> (last accessed Dec. 2, 2025).

²³ <https://www.linkedin.com/company/aylo services> (last accessed Dec. 2, 2025).

- a. Defendants Aylo Freesites, Aylo Premium, Aylo Group, Aylo Technologies, and Donormass share offices at Block 1, 195-197 Old Nicosia-Limassol Road, Dali Industrial Zone 2540, Cyprus.
- b. Defendants 9279-2738 Quebec Inc. and 9219-1568 Quebec Inc. share offices at 777 Decarie Boulevard, Suite 300, Montreal, Quebec, H4P 2H2, Canada.
- c. Defendants Aylo Holdings S.A.R.L. and Aylo Media S.A.R.L. share offices at 46, Grand Rue, Luxembourg.
- d. Defendant Aylo Global Entertainment (Europe) Limited is headquartered at 167-169 Great Portland Street, 5th floor, London, W1W 5PF.
- e. Defendants Aylo Global Entertainment Inc. and Aylo USA Incorporated share offices at 610 Brazos St, Suite 500 Austin, Texas 78701.

57. Aylo also uses a common email system, including the following email addresses: media@aylo.com, info.nicosia@aylo.com, info.montreal@aylo.com, info.luxembourg@aylo.com, info.london@aylo.com, info.austin@aylo.com.²⁴

58. Aylo requests that legal service of process for *all* of its brands is directed to one address: 195-197 Old Nicosia-Limassol Road, Block 1 Dali Industrial Zone, Cyprus 2540.²⁵

²⁴ See *Contact us*, <https://www.aylo.com/contact> (last accessed Dec. 2, 2025).

²⁵ See *Legal Service Process*, <https://legalservice.aylo.com/legal/datarequest> (last accessed Dec. 2, 2025).

59. On job listings, Aylo states: “Established in 2004, **we** are a tech pioneer offering world-class adult entertainment and games on some of the internet’s safest and most popular platforms.” (Emphasis Added.) Aylo further states: “**We** have offices in Montreal (Quebec), Austin (Texas) and Nicosia (Cyprus).” (Emphasis Added). Aylo’s Terms of Service states: “**We** are in Luxembourg, United Kingdom, Canada, United States, and Cyprus.” (Emphasis added).

60. In at least ten press releases, Aylo stated: “Aylo holds a number of widely popular and diverse online adult entertainment and gaming properties. Its portfolio includes Pornhub, YouPorn, Brazzers, Men.com, Nutaku, and more, all of which maintain robust trust and safety protocols.”²⁶ The brands that Aylo lists are again operated by different Aylo entites, including Aylo Freesites and Aylo Premium.

61. Because Defendants have operated as corporate alter egos of one another, each of them is liable for the acts and practices alleged below.

V. INDIANA’S AGE VERIFICATION LAW

62. Ind. Code § 24-4-23-10 provides that an adult oriented website operator may not knowingly or intentionally publish an adult oriented website unless the adult oriented website operator uses a reasonable age verification method to prevent a minor from accessing the adult oriented website.

63. Ind. Code § 24-4-23-2 defines “adult oriented website operator” as a person that owns or operates an adult oriented website. An “adult oriented website

²⁶ See *The latest news from Aylo*, <https://www.aylo.com/newsroom> (last accessed Nov. 18, 2025).

operator” does not include a newspaper or news service, a cloud service provider, or internet providers or search engines that solely provide access to websites and are not responsible for creating or publishing the content that is harmful to minors.

64. Ind. Code § 24-4-23-1 defines an “adult oriented website” as a publicly accessible website that publishes material harmful to minors, if at least one-third (1/3) of the images and videos published on the website depict material harmful to minors.

65. Ind. Code § 24-4-23-3 defines “material harmful to minors” as matter or a performance described in Ind. Code § 35-49-2-2, which includes matters or performances that:

- (1) describe or represent, in any form, nudity, sexual conduct, sexual excitement, or sado-masochistic abuse;
- (2) considered as a whole, appeal to the prurient interest in sex of minors;
- (3) are patently offensive to prevailing standards in the adult community as a whole with respect to what is suitable for minors; and
- (4) considered as a whole, lacks serious literary, artistic, political, or scientific value for minors.

66. Ind. Code § 24-4-23-7 defines “reasonable age verification method” as “a method of determining that an individual seeking to access a website containing material harmful to minors is not a minor by using one (1) or more of the following methods:

- (1) A mobile credential.

(2) An independent third-party age verification service that compares the identifying information entered by the individual who is seeking access with material that is available from a commercially available data base, or an aggregate of data bases, that is regularly used by government agencies and businesses for the purpose of age and identity verification.

(3) Any commercially reasonable method that relies on public or private transactional data to verify the age of the individual attempting to access the material.”

67. Pursuant to Ind. Code § 24-4-23-15, the Attorney General may bring an action to obtain an injunction to enjoin future violations of Indiana’s Age Verification Law, civil penalties, and the Attorney General’s reasonable costs in investigating violations and maintaining such actions.

VI. PROCEDURAL HISTORY

68. The Indiana General Assembly enacted Senate Enrolled Act 17, Indiana’s Age Verification Law, to address the harms to minors caused by freely available, graphic internet pornography.

69. Senate Enrolled Act 17 was signed into law on March 13, 2024, and was set to become effective on July 1, 2024.

70. On June 10, 2024, in *Free Speech Coalition, Inc. v. Rokita*, Case No. 1:24-cv-980 in the United States District Court for the Southern District of Indiana (“*Free Speech Coalition v. Rokita*”), a group of plaintiffs that included Aylo Freesites and Aylo Premium sued to enjoin enforcement of Senate Enrolled Act 17.

71. On June 28, 2024, the Court in *Free Speech Coalition v. Rokita* granted a preliminary injunction that temporarily prevented the enforcement of the law.

72. However, on August 16, 2024, the Seventh Circuit stayed the preliminary injunction, ruling that Indiana’s Age Verification Law was fully enforceable pending the U.S. Supreme Court’s ruling in *Free Speech Coalition v. Paxton*, a lawsuit stemming from a “functionally identical” Texas law.

73. During oral argument at the Supreme Court in *Paxton*, counsel for Aylo Premium and Aylo Freesites conceded that it is a “fair guess” that more than fifty percent of his “clients’ materials” is “obscene for minors,” and it “may be correct” that more than 70 percent is obscene as to minors. Transcript of Oral Argument at 20–21, *Paxton*, No. 23-1122, 145 S. Ct. 2291 (2025). That concession establishes that at least one-third (1/3) of the images and videos published on Aylo Freesites’s and Aylo Premium’s websites depict graphic and obscene pornographic material that is harmful to minors under Ind. Code § 24-4-23-3.

74. On June 27, 2025, the Supreme Court issued its opinion in *Free Speech Coalition v. Paxton*. The Supreme Court ruled that the “functionally identical” Texas law, HB 1181, was subject to intermediate scrutiny because it had only an incidental effect on protected speech. The Supreme Court further ruled that HB 1181 survived intermediate scrutiny because it “advances important governmental interests unrelated to the suppression of free speech and does not burden substantially more speech than necessary to further those interests.” *Paxton*, 145 S. Ct. at 2302 (*quoting Turner Broad. Sys., Inc. v. FCC*, 520 U.S. 180, 189 (1997)).

75. Following the Supreme Court’s decision in *Free Speech Coalition v. Paxton*, the Seventh Circuit reversed and vacated the preliminary injunction issued in *Free Speech Coalition v. Rokita*, then remanded the case to the United States District Court for the Southern District of Indiana with instructions to enter judgment for the State of Indiana on Aylo Freesites’s and Aylo Premium’s First Amendment claim.

76. On September 4, 2025, Aylo Freesites and Aylo Premium filed a motion for voluntary dismissal with prejudice of all its claims in *Free Speech Coalition v. Rokita*, which the District Court granted on September 30, 2025.

77. Notwithstanding the Seventh Circuit’s ruling that Indiana’s Age Verification Law has been fully enforceable since August 16, 2024, beginning on July 30, 2025, the Office of the Indiana Attorney General became aware of Aylo’s failure to implement reasonable age verification methods in violation of Ind. Code § 24-4-23-10.

VII. STATEMENT OF FACTS

A. Aylo Has Failed to Comply with Indiana’s Age Verification Law

i. Defendants’ Websites

78. Defendants own and operate various publicly accessible websites that publish graphic and obscene pornographic material.

79. Defendants own and operate pornhub.com, youporn.com, redtube.com, tube8.com, and thumbzilla.com, which are publicly accessible websites that publish graphic and obscene pornographic material.

80. Defendants also own and operate the following publicly accessible websites that publish certain free pornographic material and offer access to additional pornographic material for paid subscribers: brazzers.com, faketaxi.com, letsdoeit.com, and spicevids.com, babes.com, blackgfs.com, blackmaleme.com, brazzersnetwork.com, bromo.com, czechhunter.com, daredorm.com, digitalplayground.com, erito.com, hentai-pros.com, iknowthatgirl.com, lookathernow.com, maleaccess.com, men.com, mofos.com, momslickteens.com, moneytalks.com, privatamateure.com, realitydudes.com, realitydudesnetwork.com, realitykings.com, seancody.com, squirted.com, transangels.com, transharder.com, trueamateurs.com, twistys.com, twistysnetwork.com, welivetogether.com, whynotbi.com, mydirtyclub.com, mydirtyhobby.com, mydirtyhobby.de, and privatamateure.com.

81. Defendants also coordinate with professional studios, “content partners”, and “models” to create pornographic content, and Defendants publish this content through channels on their websites. For example, Defendants’ MOFOS, Brazzers, Faketaxi, and Men.com brands have channels on Defendants’ adult oriented websites:

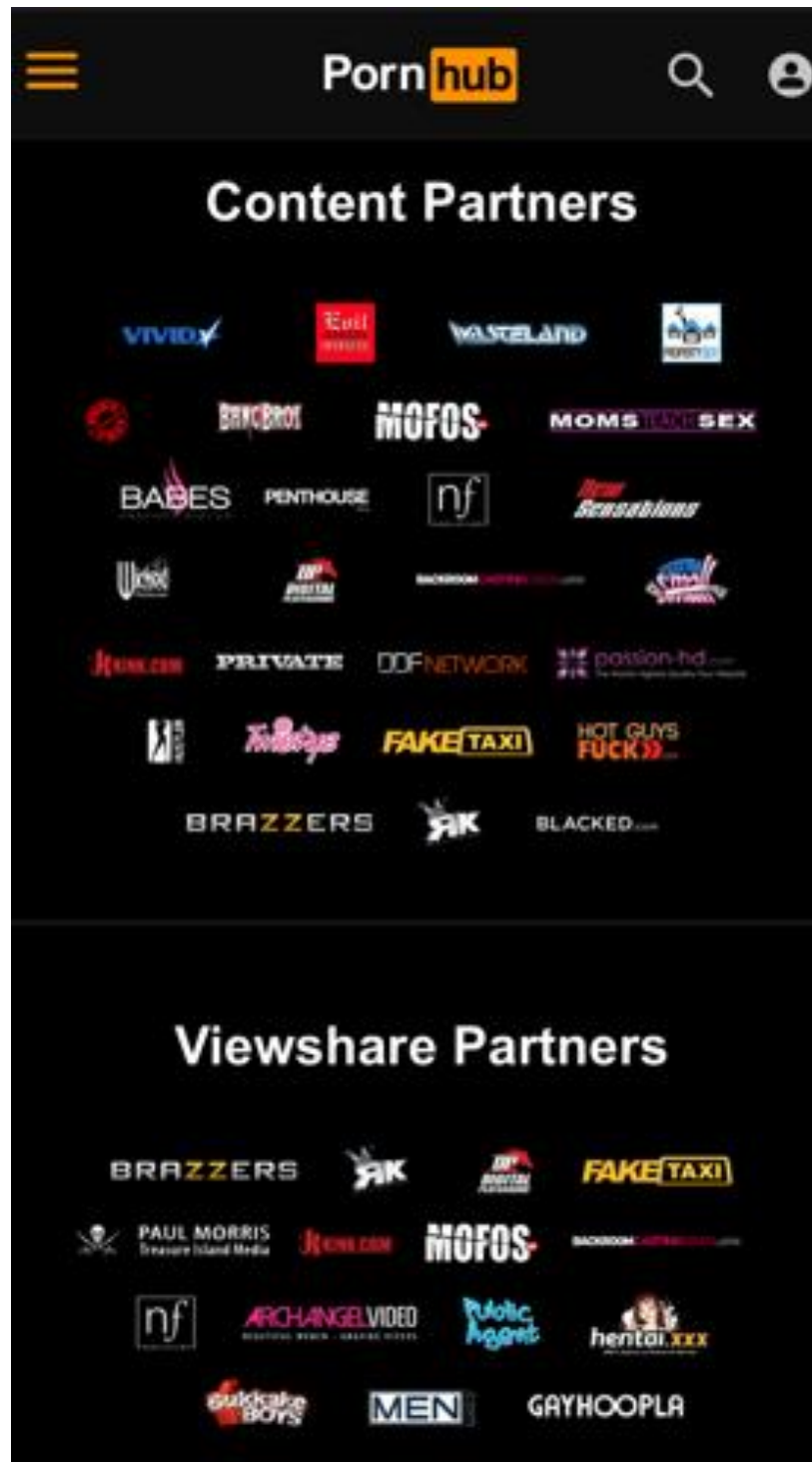


Figure 3²⁷

²⁷ See Pornhub Network Content Partner Program, <https://www.pornhub.com/partners/cpp> (last accessed Nov. 30, 2025).

a. Pornhub.com

82. On or around July 30, 2025, an investigator employed by the Office of the Indiana Attorney General (“OAG Investigator”) accessed Pornhub.com from Indiana using a Virtual Private Network (VPN) with a Chicago, Illinois IP address and discovered that the website lacked any reasonable form of age verification to prevent minors from accessing the harmful sexual material published on the website.

83. VPNs hide a device’s IP address by routing internet traffic through a remote server in another location thus making it appear as if the user is located somewhere else.²⁸ The Chicago IP access was the geographically closest access point to Indiana offered by the VPN service used by the OAG Investigators.

84. When the OAG Investigator navigated to Pornhub.com, a box appeared with an “enter” button and the OAG Investigator simply clicked the “enter” button to “confirm” that he was over eighteen years old. There were no requirements to enter the website beyond clicking the button to agree that he was over eighteen years old.

85. When the OAG Investigator accessed Pornhub.com, he observed on the homepage at least forty previews with hyperlinks to pornographic videos that could be accessed without any age-verification check. When the investigator hovered over the previews, they depicted pornographic scenes of sexual intercourse. These previews could also be accessed and viewed without any verification of the user’s age.

86. When the OAG Investigator clicked on one of the videos on the

²⁸ See, e.g., *What does a VPN hide? 6 common identifiers VPNs disguise* (Feb. 21, 2025), <https://us.norton.com/blog/privacy/what-does-a-vpn-hide>.

Pornhub.com homepage, the video depicted oral and vaginal sex. When the OAG Investigator navigated back to the home page and clicked on another video, the second video depicted vaginal sex, oral sex, and group sex. When the OAG Investigator scrolled below the second video, the webpage showed sixteen more video previews depicting pornographic scenes. When the OAG Investigator clicked on another video, it depicted oral and vaginal sex.

87. At least one third (1/3) of the images and videos published on Pornhub.com depicted “material harmful to minors,” as defined by Ind. Code § 24-4-23-3.

88. Defendants have not implemented any reasonable form of age verification on its website Pornhub.com as required by Ind. Code § 24-4-23-10.

89. When the OAG Investigator accessed Pornhub.com, the only requirement to enter the website was to click the “enter” button that ostensibly confirms the user is over the age of eighteen. This performative check does not actually verify the age of the user attempting to access the pornographic material and does not comply with the requirements of Ind. Code § 24-4-23-10.

b. Brazzers.com

90. On or around August 12, 2025, an investigator employed by the Office of the Indiana Attorney General (“OAG Investigator”) accessed Brazzers.com from Indiana using a VPN with a Chicago, Illinois IP address and discovered that the website lacked any reasonable form of age verification to prevent minors from accessing the harmful sexual material published on the website.

91. When the OAG Investigator navigated to Brazzers.com, a box appeared with an “enter” button and the OAG Investigator simply clicked the “enter” button to “confirm” that she was over eighteen years old. There were no requirements to enter the website beyond clicking the button to agree that she was over eighteen years old.

92. The OAG Investigator observed on the Brazzers.com homepage at least twelve pornographic video previews with hyperlinks to pornographic videos. When the investigator hovered over the previews, they depicted pornographic scenes of sexual intercourse. These previews could be accessed and viewed without any verification of the user’s age.

93. When the OAG Investigator clicked on one of the videos on the Brazzers.com, the video depicted vaginal and oral sex. When the OAG Investigator scrolled below the video, to the bottom of the page, the webpage contained more video previews depicting pornographic scenes. When the OAG Investigator clicked on another video, it depicted more scenes of oral and vaginal sex.

94. At least one third (1/3) of the images and videos published on Brazzers.com depicted “material harmful to minors,” as defined by Ind. Code § 24-4-23-3.

95. Defendants have not implemented any form of age verification on its website Brazzers.com as required by Ind. Code § 24-4-23-10.

96. When the OAG Investigator accessed Brazzers.com, the only requirement to enter the website was to click the “enter” button that ostensibly confirms the user is over the age of eighteen. This performative check does not

actually verify the age of the user attempting to access the pornographic material and does not comply with the requirements of Ind. Code § 24-4-23-10.

c. Faketaxi.com

97. On or around August 12, 2025, an investigator employed by the Office of the Indiana Attorney General (“OAG Investigator”) accessed Faketaxi.com from Indiana using a VPN with a Chicago, Illinois IP address and discovered that the website lacked any reasonable form of age verification to prevent minors from accessing the harmful sexual material published on the website.

98. When the OAG Investigator navigated to Faketaxi.com, a box appeared with an “enter” button and the OAG Investigator simply clicked the “enter” button to “confirm” that she was over eighteen years old. There were no requirements to enter the website beyond clicking the button to agree that she was over eighteen years old.

99. On the Faketaxi.com homepage, the OAG Investigator observed pornographic video and image previews with hyperlinks to pornographic videos. The previews could be accessed without any age verification-check.

100. At least one third (1/3) of the images and videos published on Faketaxi.com depicted “material harmful to minors,” as defined by Ind. Code § 24-4-23-3.

101. Defendants have not implemented any reasonable form of age verification on its website Faketaxi.com as required by Ind. Code § 24-4-23-10.

102. When the OAG Investigator accessed Faketaxi.com, the only requirement to enter the website was to click the “enter” button that ostensibly

confirms the user is over the age of eighteen. This performative check does not actually verify the age of the user attempting to access the pornographic material and does not comply with the requirements of Ind. Code § 24-4-23-10.

d. Spicevids.com

103. On or around August 12, 2025, an investigator employed by the Office of the Indiana Attorney General (“OAG Investigator”) accessed the website Spicevids.com from Indiana using a VPN with a Chicago, Illinois IP address and discovered that the website lacked any reasonable form of age verification to prevent minors from accessing the harmful sexual material published on the website.

104. When the OAG Investigator navigated to Spicevids.com, a box appeared with an “enter” button and the OAG Investigator simply clicked the “enter” button to “confirm” that she was over eighteen years old. There were no requirements to enter the website beyond clicking the button to agree that she was over eighteen years old.

105. On the Spicevids.com homepage, the OAG Investigator observed pornographic videos and image previews with hyperlinks to pornographic videos that could be accessed without any age-verification check. When the OAG Investigator hovered over the previews, they depicted pornographic scenes of sexual intercourse. The hyperlinks opened videos of sexually explicit content, including depictions of oral and vaginal sex. The previews and videos could be accessed without any age-verification check.

106. At least one third (1/3) of the images and videos published on Spicevids.com depicted “material harmful to minors,” as defined by Ind. Code § 24-4-

23-3.

107. Defendants have not implemented any reasonable form of age verification on its website Spicevids.com as required by Ind. Code § 24-4-23-10.

108. When the OAG Investigator accessed Spicevids.com, the only requirement to enter the website was to click the “enter” button that ostensibly confirms the user is over the age of eighteen. This performative check does not actually verify the age of the user attempting to access the pornographic material and does not comply with the requirements of Ind. Code § 24-4-23-10.

e. Letsdoeit.com

109. On or around September 2, 2025, an investigator employed by the Office of the Indiana Attorney General (“OAG Investigator”) accessed the website Letsdoeit.com from Indiana using a VPN with a Chicago, Illinois IP address and discovered that the website lacked any reasonable form of age verification to prevent minors from accessing the harmful sexual material published on the website.

110. When the OAG Investigator navigated to Letsdoeit.com, a box appeared with an “enter” button and the OAG Investigator simply clicked the “enter” button to “confirm” that he was over eighteen years old. There were no requirements to enter the website beyond clicking the button to agree that he was over eighteen years old.

111. When the OAG Investigator accessed Letsdoeit.com, he observed on the homepage at least twenty-eight pornographic video previews with hyperlinks to pornographic videos. When the investigator hovered over the previews, they depicted pornographic scenes of sexual intercourse. These previews could be accessed and

viewed without any verification of the user's age.

112. When the OAG Investigator clicked on one of the videos, it depicted vaginal and oral sex. When the OAG Investigator returned to the homepage and clicked on another video, it depicted more scenes of vaginal and oral sex.

113. At least one third (1/3) of the images and videos published on Letsdoeit.com depicted "material harmful to minors," as defined by Ind. Code § 24-4-23-3.

114. Defendants have not implemented any reasonable form of age verification on its website Letsdoeit.com as required by Ind. Code § 24-4-23-10.

115. When the OAG Investigator accessed Letsdoeit.com, the only requirement to enter the website was to click the "enter" button that ostensibly confirms the user is over the age of eighteen. This performative check does not actually verify the age of the user attempting to access the pornographic material and does not comply with the requirements of Ind. Code § 24-4-23-10.

f. Redtube.com

116. On or around September 9, 2025, an investigator employed by the Office of the Indiana Attorney General ("OAG Investigator") accessed Redtube.com from Indiana using a VPN with a Chicago, Illinois IP address and discovered that the website lacked any reasonable form of age verification to prevent minors from accessing the harmful sexual material published on the website.

117. When the OAG Investigator navigated to Redtube.com, a box appeared with an "enter" button and the OAG Investigator simply clicked the "enter" button to

“confirm” that he was over eighteen years old. There were no requirements to enter the website beyond clicking the button to agree that he was over eighteen years old.

118. When the OAG Investigator accessed Redtube.com, he observed on the homepage at least thirteen previews with hyperlinks to pornographic videos that could be accessed without any age-verification check. When the investigator hovered over the previews, they depicted pornographic scenes of sexual intercourse. These previews could also be accessed and viewed without any verification of the user’s age.

119. When the OAG Investigator clicked on one of the videos on the Redtube.com homepage, the video depicted vaginal sex. When the OAG Investigator returned to the homepage and clicked on another video, the second video depicted another scene of vaginal sex.

120. At least one third (1/3) of the images and videos published on Redtube.com depicted “material harmful to minors,” as defined by Ind. Code § 24-4-23-3.

121. Defendants have not implemented any reasonable form of age verification on its website Redtube.com as required by Ind. Code § 24-4-23-10.

122. When the OAG Investigator accessed Redtube.com, the only requirement to enter the website was to click the “enter” button that ostensibly confirms the user is over the age of eighteen. This performative check does not actually verify the age of the user attempting to access the pornographic material and does not comply with the requirements of Ind. Code § 24-4-23-10.

g. Thumbzilla.com

123. On or around September 9, 2025, an investigator employed by the Office of the Indiana Attorney General (“OAG Investigator”) accessed Thumbzilla.com from Indiana using a VPN with a Chicago, Illinois IP address and discovered that the website lacked any reasonable form of age verification to prevent minors from accessing the harmful sexual material published on the website.

124. When the OAG Investigator navigated to Thumbzilla.com, a box appeared with an “enter” button and the OAG Investigator simply clicked the “enter” button to “confirm” that he was over eighteen years old. There were no requirements to enter the website beyond clicking the button to agree that he was over eighteen (18) years old.

125. When the OAG Investigator accessed Thumbzilla.com, he observed on the homepage at least twenty-eight previews with hyperlinks to pornographic videos that could be accessed without any age-verification check. When the investigator hovered over the previews, they depicted pornographic scenes. These previews could also be accessed and viewed without any verification of the user’s age.

126. When the OAG Investigator clicked on one of the video links on the Thumbzilla.com homepage, it led to an image depicting vaginal sex. When the OAG Investigator returned to the homepage and clicked on another video link, it led to another image that depicted vaginal sex. When the OAG Investigator returned to the homepage again and clicked on another video link, it led to an image with a penis on top of a naked woman.

127. At least one third (1/3) of the images and videos published on Thumbzilla.com depicted “material harmful to minors,” as defined by Ind. Code § 24-4-23-3.

128. Defendants have not implemented any reasonable form of age verification on their website Thumbzilla.com as required by Ind. Code § 24-4-23-10.

129. When the OAG Investigator accessed Thumbzilla.com, the only requirement to enter the website was to click the “enter” button that ostensibly confirms the user is over the age of eighteen. This performative check does not actually verify the age of the user attempting to access the pornographic material and does not comply with the requirements of Ind. Code § 24-4-23-10.

h. Tube8.com

130. On or around September 9, 2025, an investigator employed by the Office of the Indiana Attorney General (“OAG Investigator”) accessed Tube8.com from Indiana using a VPN with a Chicago, Illinois IP address and discovered that the website lacked any reasonable form of age verification to prevent minors from accessing the harmful sexual material published on the website.

131. When the OAG Investigator navigated to Tube8.com, a box appeared with an “enter” button and the investigator simply clicked the “enter” button to “confirm” that he was over eighteen years old. There were no requirements to enter the website beyond clicking the button to agree that he was over eighteen years old.

132. When the OAG Investigator accessed Tube8.com, he observed on the homepage at least thirty previews with hyperlinks to pornographic videos that could

be accessed without any age-verification check. When the investigator hovered over the previews, they depicted pornographic scenes of sexual intercourse. These previews could also be accessed and viewed without any verification of the user's age.

133. When the OAG Investigator clicked on one of the videos on the Tube8.com homepage, the video depicted vaginal sex. When the OAG Investigator returned to the homepage and clicked on another video, the second video depicted another scene of vaginal sex.

134. At least one third (1/3) of the images and videos published on Tube8.com depicted "material harmful to minors," as defined by Ind. Code § 24-4-23-3.

135. Defendants have not implemented any reasonable form of age verification on its website Tube8.com as required by Ind. Code § 24-4-23-10.

136. When the OAG Investigator accessed Tube8.com, the only requirement to enter the website was to click the "enter" button that ostensibly confirms the user is over the age of eighteen. This performative check does not actually verify the age of the user attempting to access the pornographic material and does not comply with the requirements of Ind. Code § 24-4-23-10.

i. Youporn.com

137. On or around September 9, 2025, an investigator employed by the Office of the Indiana Attorney General ("OAG Investigator") accessed Youporn.com from Indiana using a VPN with a Chicago, Illinois IP address and discovered that the website lacked any reasonable form of age verification to prevent minors from accessing the harmful sexual material published on the website.

138. When the OAG Investigator navigated to Youporn.com, a box appeared with an “enter” button and the OAG Investigator simply clicked the “enter” button to “confirm” that he was over eighteen years old. There were no requirements to enter the website beyond clicking the button to agree that he was over eighteen (18) years old.

139. When the OAG Investigator accessed Youporn.com, he observed on the homepage at least ten previews with hyperlinks to pornographic videos that could be accessed without any age-verification check. When the investigator hovered over the previews, they depicted pornographic scenes of sexual intercourse. These previews could also be accessed and viewed without any verification of the user’s age.

140. When the OAG Investigator clicked on one of the videos on the Youporn.com homepage, the video depicted vaginal and oral sex. When the OAG Investigator returned to the homepage and clicked on another video, the second video depicted a scene of sexual intercourse.

141. At least one third (1/3) of the images and videos published on Youporn.com depicted “material harmful to minors,” as defined by Ind. Code § 24-4-23-3.

142. Defendants have not implemented any reasonable form of age verification on its website Youporn.com as required by Ind. Code § 24-4-23-10.

143. When the OAG Investigator accessed Youporn.com, the only requirement to enter the website was to click the “enter” button that ostensibly confirms the user is over the age of eighteen. This performative check does not

actually verify the age of the user attempting to access the pornographic material and does not comply with the requirements of Ind. Code § 24-4-23-10.

j. Additional Websites

144. On or around November 23, 2025, an investigator employed by the Office of the Indiana Attorney General (“OAG Investigator”), accessed the following websites in Indiana using a VPN with a Chicago, Illinois IP address and was able to view pornographic material on each website. The OAG Investigator observed that the following websites, owned and operated by Defendants, lack any reasonable form of age verification. When the OAG Investigator accessed each of the following websites, the only requirement to enter each website was to click the “enter” button that ostensibly confirms the user is over the age of eighteen. However, this performative check does not actually verify the age of the user attempting to access the pornographic material and does not comply with the requirements of Ind. Code § 24-4-23-10. The OAG Investigator accessed:

- a. Babes.com;
- b. Blackgfs.com;
- c. Blackmaleme.com;
- d. Brazzersnetwork.com;
- e. Bromo.com;
- f. Czechhunter.com;
- g. Daredorm.com;
- h. Digitalplayground.com;

- i. Erito.com;
- j. Hentai-pros.com;
- k. Iknowthatgirl.com;
- l. Lookathernow.com;
- m. Maleaccess.com;
- n. Men.com;
- o. Mofos.com;
- p. Momslickteens.com;
- q. Moneytalks.com;
- r. Privatamateure.com;
- s. Realitydudes.com;
- t. Realitydudesnetwork.com;
- u. Realitykings.com;
- v. Seancody.com;
- w. Squirted.com;
- x. Transangels.com;
- y. Transharder.com;
- z. Trueamateurs.com;
- aa. Twistys.com;
- bb. Twistysnetwork.com;
- cc. Welivetogether.com;
- dd. Whynotbi.com;

ee. Mydirtyclub.com;
ff. Mydirtyhobby.com;
gg. Mydirtyhobby.de; and
hh. Privatamateure.com.

ii. The Ineffectiveness of IP Address-based Restrictions

145. As of the date of this filing, Defendants’ websites identified above restrict access by users whose devices purport to be in Indiana. These restrictions are based on the IP address associated with that device.

146. Rather than implement a reasonable age verification method, Defendants’ websites display a message when a user with an Indiana IP address attempts to access the website, stating “we have made the difficult decision to *completely* disable access in Indiana.”²⁹

147. These restrictions based on IP address, which only apply to IP addresses in states like Indiana with age-verification laws, are unreliable and do not prevent minors in Indiana from accessing sexually explicit material.

148. Defendants’ putative IP address restrictions are insufficient to comply with Indiana’s Age Verification Law because Indiana residents, including minors, can still easily access the Defendants’ websites with a VPN IP or proxy address from another jurisdiction or through the use of location spoofing software.

²⁹ See, e.g., “Dear user” message, <https://www.pornhub.com> (last accessed Nov. 29, 2025) (emphasis added), accord “Dear user” message, <https://www.redtube.com> (last accessed Nov. 29, 2025) & “Dear user” message, <https://www.youporn.com> (last accessed Nov. 29, 2025).

149. When Defendants’ websites are accessed in Indiana using a VPN or proxy IP address from another jurisdiction or location spoofing software to indicate their location is somewhere access is not restricted, Defendants do not require any reasonable form of age verification. The only requirement to enter Defendants’ websites is to click the “enter” button that ostensibly confirms the user is over the age of eighteen. However, this performative check does not actually verify the age of the user attempting to access the pornographic material and does not comply with the requirements of Ind. Code § 24-4-23-10.

150. IP address restrictions do not relieve Defendants of their obligation to comply with Ind. Code § 24-4-23-10.

151. Because VPN services are often free and readily available, a minor in Indiana can easily access pornographic websites with IP address restrictions with minimal effort and no cost.

152. Indeed, searches for “vpn” increase by as much as thirty percent in the week that an age-verification law takes effect.³⁰ After a few months, “vpn” searches subside from this temporary spike, which indicates a one-time search by users to download a VPN and then use it moving forward to access IP address restricted pornographic websites.³¹

153. Moreover, Defendants have publicly admitted they know that VPNs may be used, and are used, to evade age verification requirements. In *Free Speech*

³⁰ Noah Spencer, *Age Verification Laws, Firm Responses, and Porn Consumption* at 7 (Mar. 4, 2025), *available at* SSRN, <https://ssrn.com/abstract=5165280>.

³¹ *Id.*

Coalition, Inc. v. Rokita, Defendants alleged in their Complaint:

- a. “[M]inors can use proxy servers, virtual private networks (“VPNs”), the ‘Tor’ browser, and numerous other circumventions to bypass the Act’s verification requirements with ease”;³²
- b. “Virtual Private Networks (“VPNs”) and proxy servers, among countless other inexpensive and easily accessible technologies, bypass geoblocking by websites. . . . VPNs are extremely common”;³³
- c. “[S]tate-specific restrictions on traditional adult websites can be easily bypassed by VPNs”;³⁴
- d. “All of this is magnified by the fact that minors are more tech-savvy than adults, especially older adults. Evaders of the law at the end-user level will thus largely be comprised of minors.”³⁵

154. Defendants have also publicly admitted that restrictions based on IP address alone are also highly inaccurate. Defendants themselves alleged in *Free Speech Coalition, Inc. v. Rokita* that accuracy may be as low as fifty-five percent.³⁶

155. However, notwithstanding Defendants’ IP address restrictions, Defendants continue to track Indiana users, further demonstrating Defendants’ knowing violations. Defendants implemented IP address restrictions on Pornhub.com for Indiana users on or around June 27, 2024, but Pornhub still

³² *Free Speech Coalition, Inc. v. Rokita*, Case No. 1:24-cv-980, Compl., Doc. 1 at ¶ 4.

³³ *Id.* ¶ 34.

³⁴ *Id.* ¶ 42.

³⁵ *Id.* ¶ 43.

³⁶ *Id.* ¶ 33.

included Indiana-specific data in its 2025 Valentine’s Day survey and 2025 Super Bowl survey, *supra* Figures 1 & 2.

156. Defendants are thus fully aware that Indiana residents, including minors, are still able to access the sexually explicit material on its websites.

157. Despite admitting the inaccuracy of restrictions based on IP address, admitting that such restrictions are “easily bypassed by VPNs”, and continuing to track Indiana users *after* implementing IP address restrictions in Indiana, Defendants represent on their websites: “[W]e have made the difficult decision to *completely* disable access in Indiana.”³⁷

158. Defendants have not “completely” disabled access to its websites in Indiana, and Defendants’ are knowingly misrepresenting the extent to which Indiana users, including Indiana minors, can continue to access Defendants’ adult oriented websites.

159. Defendants’ conduct violates Indiana’s Age Verification Law, and its misrepresentations to Indiana consumers, particularly parents, regarding the extent to which Defendants’ adult oriented websites continue to be available to Indiana minors violate Indiana’s Deceptive Consumer Sales Act, which prohibits such unfair, abusive, and deceptive acts, omissions, and practices.

³⁷ See, e.g., “Dear user” message, <https://www.pornhub.com> (last accessed Nov. 29, 2025) (emphasis added), accord “Dear user” message, <https://www.redtube.com> (last accessed Nov. 29, 2025) & “Dear user” message, <https://www.youporn.com> (last accessed Nov. 29, 2025).

B. Aylo Misrepresented its Efforts to Limit CSAM and NCM on its Adult Oriented Websites and Engaged in Other Unfair, Abusive, and Deceptive Acts, Omissions, and Practices

i. The Transparency Report Misrepresentations

160. Defendants' Transparency Reports published on Pornhub.com falsely represented to Indiana consumers its efforts to limit child-sex abuse material ("CSAM") and nonconsensual material ("NCM").

161. Most consumers do not want to view or possess CSAM or NCM. As an initial matter, the viewing or possession of CSAM exposes one to civil and criminal liability in the United States. Thus, Defendants' exposure of consumers to CSAM and NCM, especially when Defendants misrepresent that such content does not exist on their websites, induces consumers to unknowingly engage in potentially unlawful conduct. And, even beyond the legal liability aspect, Defendants' own marketing promises consumers that their websites would not carry such content, further establishing this content's undesirability for most consumers.

162. Defendants' Pornhub 2020 Transparency Report stated that it sought to make Pornhub the "safest platform on the web."³⁸

163. In Defendants' Pornhub 2021, 2022, 2023 (First Half), 2023 (Second Half), 2024 (First Half), and 2024 (Second Half) Transparency Reports, it stated, "nothing is more important than the safety of our community." Pornhub's Transparency Reports further stated, "we have *always* been committed to preventing

³⁸ See *Pornhub 2020 Transparency Report*, <https://help.pornhub.com/hc/en-us/articles/46213042243475-2020-Transparency-Report>.

and eliminating illegal content, including nonconsensual material and child-sex abuse material (CSAM).” (Emphasis added).³⁹

164. Defendants’ Pornhub 2020, 2021, 2022, 2023 (First Half), 2023 (Second Half), 2024 (First Half), 2024 (Second Half), and 2025 (First Half) Transparency Reports all stated that “consent” is a core value of Pornhub’s.⁴⁰

165. Pornhub’s 2021, 2022, 2023 (First Half), and 2023 (Second Half) Transparency Reports stated that a violation of the Non-consensual Content Policy included the “recording of sexually explicit activity without the consent of the featured person”.⁴¹

166. In contrast to Defendants’ multiple representations that it has “always been committed to preventing and eliminating illegal content, including nonconsensual material and child-sex abuse material”, Pornhub.com has a history of allowing nonconsensual and child-sex abuse material.

167. A December 4, 2020, *New York Times* Op-Ed titled, “The Children of Pornhub” (the “New York Times Op-Ed”), reported that “many videos” on Pornhub were “recordings of assaults on unconscious women and girls.” The New York Times Op-Ed further reported that the rapists would open the eyelids of the victims and touch their eyeballs to show that they were nonresponsive.⁴²

³⁹ See *Pornhub Transparency Reports*, <https://help.pornhub.com/hc/en-us/sections/5357288459027-Transparency-Reports>.

⁴⁰ *Id.*

⁴¹ *Id.*

⁴² Nicholas Kristof, *The Children of Pornhub*, NYT (Dec. 4, 2020), <https://www.nytimes.com/2020/12/04/opinion/sunday/pornhub-rape-trafficking.html>.

168. The New York Times Op-Ed reported on many other examples of CSAM and NCM on Pornhub.com, including: a fifteen year old girl that appeared in fifty-eight sex videos, a sex video of another fifteen year old girl, sexual assaults of a fourteen year old, a woman being raped by a gang of men, a fourteen year old whose naked video that was shared with a boyfriend ended up on Pornhub.com, and two videos of prepubescent girls being assaulted.

169. Pornhub's search algorithm offered users the ability to search for CSAM and NCM. The New York Times Op-Ed reported that searches for "girls under18" and "14yo" each returned more than 100,000 videos. A search for "r*pe" turned up 1,901 videos. "Girl with braces" turned up 1,913 videos and suggested also trying "exxxtra small teens." A search for "13yo" generated 155,000 videos. Searches for "Young Asian", returned 26,000 videos, and Pornhub suggested related searches of "young tiny teen," "extra small petite teen," "tiny Asian teen" and "young girl." A channel was named "exploited teen Asia."

170. Defendants did not remove content reported as CSAM and NCM in a timely manner. The New York Times Op-Ed reported that a woman had been trying for two years to get a video removed that featured her at fifteen years old. Further, three videos of the woman at age fifteen or sixteen were still available on Pornhub.com when the New York Times Op-Ed was published.

171. In contrast to Defendants' representations in its Transparency Reports that consent is a "core value", and that they always been committed to removing CSAM and NCM, Defendants allowed the upload of at least eleven million videos and

photos on Pornhub.com from 2020 to 2023 without verifying the identities or consent of all the individuals appearing in the videos and photos.

172. Defendants did not verify the identities of all individuals appearing in videos uploaded on Pornhub.com until December of 2023. Further, Defendants did not obtain “proof of consent” of all the individuals appearing in videos uploaded on Pornhub.com until January 23, 2024.⁴³

173. Further, in its 2024 Cyber Tipline Report, the National Center for Missing and Exploited Children (NCMEC) found that more than half of the reports submitted by Defendants lacked adequate information to determine a location. These reports submitted by Defendants “contained so little information that it was not possible for NCMEC to determine where the offense occurred or the appropriate law enforcement agency to receive the report.”⁴⁴

ii. The Press Release Misrepresentations

174. Defendants also falsely represented to Indiana consumers its efforts to limit CSAM and NCM in its press releases.

175. When Ethical Capital Partners acquired Aylo (then-MindGeek) on March 16, 2023, the press release stated, “MindGeek is committed to quality adult entertainment made by and for consenting adults on platforms that set the standard for trust and safety[.]” A statement attributed to MindGeek Management stated, “We

⁴³ *Co-Performer Verification Updates* (Aug. 5, 2024), <https://www.pornhub.com/blog/co-performer-verification-updates>.

⁴⁴ *2024 CyberTipline Report*, NCMEC, <https://www.missingkids.org/gethelpnow/cybertipline/cybertiplinedata> (last accessed Dec. 2, 2025).

are proud to support and cultivate a strong community of content creators to express themselves, while also maintaining safe online platforms.” Fady Mansour, a founding partner of Ethical Capital Partners stated, “In MindGeek, we have identified a dynamic tech brand that is built upon a foundation of trust, safety and compliance[.]” Sarah Bain, a founding partner of Ethical Capital Partners stated, “We are confident that the MindGeek team and all MindGeek platforms operate with trust and safety at the forefront of everything they do.”⁴⁵

176. In the August 17, 2023 press release, “MindGeek becomes Aylo,” Aylo Management stated, “Our goal is for ‘Aylo’ to be synonymous with our core principles: innovation, diverse and inclusive adult content, and trust and safety.” In the same August 17, 2023, press release, Alex Kekesi, VP of Brand and Community at Aylo-owned Pornhub, stated, “Under this new banner, we will continue to commit to our core values of consent, freedom of sexual expression, authenticity, originality, and diversity.”⁴⁶

177. In a November 10, 2023 press release, Defendants stated, “Aylo is committed to quality adult entertainment made solely by and for consenting adults on platforms that set the standard for trust and safety, and instituting compliance measures that surpass those of other platforms on the internet.” Solomon Friedman, VP Compliance, Ethical Capital Partners, stated, “As the new ownership group, we

⁴⁵ *ECP Announces Acquisition of MindGeek, Parent Company of Pornhub* (March 16, 2023), <https://www.aylo.com/newsroom/ecp-announces-acquisition-of-mindgeek-parent-company-of-pornhub/>.

⁴⁶ *MindGeek Becomes Aylo*, Aylo (Aug. 17, 2023), <https://www.aylo.com/newsroom/mindgeek-becomes-aylo>.

are confident that the Aylo team and all its platforms operate with trust and safety at the forefront of everything they do.”⁴⁷

178. At the time Aylo made these statements, Aylo did not require uploaders of content to verify the identity of all the individuals in the uploads on Defendants’ websites. Aylo did not require uploaders to verify identities of all the individuals in the content until December of 2023.

179. Even after Pornhub updated its “co-performer verification” in December of 2023, it still did not verify the consent of all the individuals appearing in Pornhub.com uploads until January 23, 2024.

180. On January 15, 2024, in a press release titled, “Crime Stoppers International, Aylo and Ethical Capital Partners Enter Working Relationship,” Aylo continued to misrepresent its safeguards to protect against NCM, by stating, “This is not just about shared goals, but also about shared values, sharing resources and working together to combat ever-evolving online threats and make the internet safer for all, including minors, consenting adults and content creators.”⁴⁸

181. However, Pornhub.com did not implement “proof of consent” for all individuals appearing in content uploaded onto Pornhub.com until January 23, 2024.

182. Despite Aylo’s claims in press releases about “consent” being a core

⁴⁷ *Aylo and the United States Attorney’s Office Reach Agreement Regarding Government’s Investigation* (Nov. 10, 2023), <https://www.aylo.com/newsroom/aylo-and-the-united-states-attorneys-office-reach-agreement-regarding-governments-investigation/>.

⁴⁸ *Crime Stoppers International, Aylo and Ethical Capital Partners Enter Working Relationship* (Jan. 15, 2024), <https://www.aylo.com/newsroom/crime-stoppers-international-aylo-and-ethical-capital-partners-enter-working-relationship/>.

value, from 2020 to 2023, Pornhub.com allowed the upload of at least eleven (11) million photos and videos on Pornhub.com without verifying the identities or the consent of all the individuals in the photos and videos.

iii. Misrepresentations in the Media

183. In a podcast interview published on October 4, 2024, when asked if there is any underage porn on Pornhub, Ethical Capital Partners Partner and VP of Compliance Solomon Friedman replied, “Absolutely not.” The interviewer then asked, “Zero?”, and Mr. Friedman replied, “Zero.” As of November 17, 2025, this podcast interview had 587,000 views.⁴⁹

184. In 2020, at least 13,000 reports were submitted to NCMEC about potential CSAM on Defendants’ websites.⁵⁰

185. In 2021, 20,401 pieces of content (11,626 videos and 8,775 photos) were identified as potential CSAM on Pornhub.com. Pornhub.com users reported approximately 4,510 pieces of content as potential CSAM. 41.43% of videos that were uploaded in 2021 and reported for potential CSAM were viewed at least once.⁵¹

186. In 2022, 9,588 pieces of content (3,604 videos and 5,984 photos) were identified as potential CSAM. In 2022, Pornhub.com users reported approximately

⁴⁹ “130 Million Daily Users” - *PornHub Owner On Moderation, Sex Work & Morality*, PBD Podcast Ep. 484 (Oct. 4, 2024), *available at* <https://www.youtube.com/watch?v=CPi5WncPDak>.

⁵⁰ *2020 CyberTipline Reports by Electronic Service Providers (ESP)*, NCMEC, *available at* <https://www.missingkids.org/content/dam/missingkids/pdfs/2020-reports-by-esp.pdf> (last accessed Dec. 2, 2025).

⁵¹ *See Pornhub 2021 Transparency Report*, <https://help.pornhub.com/hc/en-us/articles/46213008134419-2021-Transparency-Report>.

1,578 pieces of content as CSAM to Pornhub.com. 30.72% of videos that were uploaded in 2022 and reported for potential CSAM were viewed at least once.⁵²

187. In 2023, 7,313 pieces of content (4,976 videos and 2,337 photos) were reported as potential CSAM on Pornhub.com. Pornhub.com users reported approximately 796 pieces of content as CSAM to Pornhub.com.⁵³

188. For videos uploaded to Pornhub.com in the first six months of 2023, 30.67% of the videos that were reported for potential CSAM were viewed at least once.⁵⁴ For videos uploaded in the last six months of 2023, 24.27% of the videos that were reported for potential CSAM were viewed at least once.⁵⁵

189. In 2024, 10,523 pieces of content (8,796 videos and 1,727 photos) were reported as potential CSAM on Pornhub.com. In 2024, Pornhub.com users reported approximately 4,505 pieces of content as CSAM to Pornhub.com.⁵⁶

190. In the first six months of 2025, 1,744 pieces of content were identified as

⁵² See *Pornhub 2022 Transparency Report*, <https://help.pornhub.com/hc/en-us/articles/46213052959123-2022-Transparency-Report>.

⁵³ See *Pornhub 2023 (First Half) and 2023 (Second Half) Transparency Reports*, available at <https://help.pornhub.com/hc/en-us/articles/46213033364371-2023-Transparency-Report-First-Half> and <https://help.pornhub.com/hc/en-us/articles/46213147539347-2023-Transparency-Report-Second-Half>.

⁵⁴ See *Pornhub 2023 (First Half) Transparency Report*, <https://help.pornhub.com/hc/en-us/articles/46213033364371-2023-Transparency-Report-First-Half>.

⁵⁵ See *Pornhub 2023 (Second Half) Transparency Report*, <https://help.pornhub.com/hc/en-us/articles/46213147539347-2023-Transparency-Report-Second-Half>.

⁵⁶ See *Pornhub 2024 (First Half) and 2024 (Second Half) Transparency Reports*, available at <https://help.pornhub.com/hc/en-us/articles/46213097399315-2024-Transparency-Report-First-Half> and <https://help.pornhub.com/hc/en-us/articles/46213396642195-2024-Transparency-Report-Second-Half>.

potential CSAM on Pornhub.com. For videos uploaded January through June of 2025, videos reported as CSAM after appearing on Pornhub.com were viewed an average of 4,087 times prior to removal, for a total of 662,094 views generated by CSAM on Pornhub.com. This figure does not include the amount of views Pornhub.com generated in 2025 from videos featuring CSAM uploaded prior to 2025.⁵⁷

iv. The Undercover Report on Aylo's Loophole

191. In a conversation with an undercover reporter published on September 13, 2023, a Technical Product Manager at Aylo (formerly MindGeek), spoke about a “loophole” on Aylo’s websites.⁵⁸ The Technical Product Manager stated, “How are you going to tell me who is in that video if that girl is not showing her face?” He continued, “You’re trying to match boobs and birth marks on their butts and stuff. Like you’re trying, ‘I know this guy's d*ck, man. That’s definitely this guy.’”⁵⁹

192. The Technical Product Manager continued, “I could be a content uploader, the only thing you need from me, you don’t need a picture of my d*ck, you need an ID. Right? You need my driver's license, which has my face on it, but it has just my face on it. You don’t see my body. And now my videos never have my face.”

⁵⁷ See *Pornhub 2025 (First Half) Transparency Report*, <https://help.pornhub.com/hc/en-us/articles/46213095031827-2025-Transparency-Report-First-Half>.

⁵⁸ *Pornhub Exec: Rapists, Traffickers Using Pornhub “Loophole” to “Make a Lot of Money”*, Sound Investigations (Sept. 13, 2023), <https://soundinvestigations.com/pornhub-loophole/>.

⁵⁹ *Pornhub Exec: Rapists, Traffickers Using Pornhub “Loophole” to “Make a Lot of Money”*, Sound Investigations (Sept. 13, 2023), available at <https://rumble.com/v3ha3zc-pornhub-exec-rapists-traffickers-using-pornhub-loophole-to-make-a-lot-of-mo.html>.

He continued, “You have to be like, ‘that guy’s body and his d*ck matches his face.’ That’s what compliance people are basically saying.”

193. When the undercover reporter asked if “rapists” and “human traffickers” use the loophole, the Technical Product Manager stated, “Of course.”

194. On September 29, 2023, twenty-six Attorneys General, including the Indiana Attorney General, wrote to Aylo to determine what was being done to address the “loophole”.⁶⁰

195. Upon information and belief, Defendants’ websites contain thousands of videos that show neither the face of a “performer” nor a “co-performer” in the video.

196. Upon information and belief, Defendants are unable to verify that faceless individuals in a video are the same individuals submitting proof of identity and proof of consent.

⁶⁰ *Carr Joins 26-State Coalition Requesting Pornhub Address Potential Child Exploitation Loophole* (September 29, 2023), <https://law.georgia.gov/press-releases/2023-09-29/carr-joins-26-state-coalition-requesting-pornhub-address-potential-child>.

VIII. CAUSE OF ACTION

COUNT I

Indiana's Age Verification Law, Ind. Code § 24-4-23-1 *et seq.*

197. The State realleges and incorporates by reference the allegations set forth in each of the preceding paragraphs of this Complaint.

198. Defendants own and operate publicly accessible adult-oriented websites that publish material harmful to minors.

199. Defendants' websites are not newspapers, news services, cloud service providers, internet providers, or search engines.

200. At least one third (1/3) of the images and videos published on Defendants' websites depict material that is harmful which (a) describe or represent nudity, sexual conduct, sexual excitement, or sado-masochistic abuse; (b) appeal to minors' prurient interest in sex; (c) are patently offensive to prevailing standards in the adult community as a whole as to what is suitable for minors; and (d) lack serious literary, artistic, political, or scientific value for minors.

201. Notwithstanding Indiana's Age Verification Law, Defendants' websites lack any reasonable age-verification method.

202. Defendants knowingly or intentionally operate its websites without reasonable age-verification methods in violation of Ind. Code § 24-4-23-10.

203. Pursuant to Ind. Code § 24-4-23-15, the Attorney General is entitled to an injunction against Defendants' violations of Indiana's Age Verification Law, civil penalties, and recovery of the reasonable costs to investigate Defendants' violations

and maintain this action.

COUNT II

Indiana Deceptive Consumer Sales Act, Ind. Code § 24-5-0.5-3(a)

204. The State realleges and incorporates by reference the allegations set forth in each of the preceding paragraphs of this Complaint.

205. The DCSA “shall be liberally construed and applied to promote its purposes and policies.” Ind. Code §§ 24-5-0.5-1(a).

206. The purposes and policies of the DCSA include protecting Indiana “consumers from suppliers who commit deceptive and unconscionable sales acts” and encouraging “the development of fair consumer sales practices.” Ind. Code §§ 24-5-0.5-1(b).

207. The DCSA prohibits a supplier from committing “an unfair, abusive, or deceptive act, omission, or practice in connection with a consumer transaction . . . whether it occurs before, during, or after the transaction. An act, omission, or practice prohibited by this section includes both implicit and explicit misrepresentations.” Ind. Code § 24-5-0.5-3(a).

208. Defendants are suppliers who regularly engage in or solicit “consumer transactions” in the State of Indiana, Ind. Code § 24-5-0.5-2(a)(3)(A), through the “sale . . . or other disposition of . . . a service, or an intangible” to persons for purposes that are primarily personal. *Id.* § 24-5-0.5-2(a)(1).

209. Defendants have and are engaged in unfair, abusive, or deceptive acts, omissions, and practices, by deceiving and misleading Indiana consumers regarding

the extent to which Indiana residents, including Indiana minors, can continue to access adult oriented websites after passage of Indiana's Age Verification Law.

210. Defendants have and are engaged in unfair, abusive, or deceptive acts, omissions, and practices, by deceiving and misleading Indiana consumers about its efforts to limit CSAM and NCM on its adult oriented websites.

211. Defendants have and are engaged in unfair, abusive, or deceptive acts, omissions, and practices, by exposing consumers to content containing CSAM, even though viewing or possessing CSAM exposes consumers to civil or criminal liability.

212. Defendants committed the acts, omissions, and practices alleged above knowingly, and therefore committed knowing violations of the Indiana Deceptive Consumer Sales Act. Pursuant to Ind. Code § 24-5-0.5-4(c) & (g), the Attorney General is entitled to an injunction against Defendants' violations of the DCSA, civil penalties, and recovery of the reasonable costs to investigate Defendants' violations and prosecute this action.

COUNT III

Indiana Deceptive Consumer Sales Act, Ind. Code § 24-5-0.5-3(b)(1)

213. The State repeats and incorporates by reference each allegation contained in the preceding paragraphs.

214. By misrepresenting to Indiana consumers their efforts to limit CSAM and NCM on their adult oriented websites, Defendants through their acts, omissions, and practices represented that their products and/or services had performance, characteristics, uses, and/or benefits they did not have, which Defendants knew or

reasonably should have known they did not have, in violation of Ind. Code § 24-5-0.5-3(b)(1).

215. By misrepresenting to Indiana consumers the extent to which Indiana residents, including Indiana minors, could continue to access adult oriented websites after passage of Indiana's Age Verification Law, Defendants, through their acts, omissions, and practices represented that their products and/or services had performance, characteristics, uses, and/or benefits they did not have, which Defendants knew or reasonably should have known they did not have, in violation of Ind. Code § 24-5-0.5-3(b)(1).

216. Defendants committed the acts, omissions, and practices alleged above knowingly, and therefore committed knowing violations of the Indiana Deceptive Consumer Sales Act. Pursuant to Ind. Code § 24-5-0.5-4(c) & (g), the Attorney General is entitled to an injunction against Defendants' violations of the DCSA, civil penalties, and recovery of the reasonable costs to investigate Defendants' violations and prosecute this action.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment against Defendants, and enter an Order:

A. Finding that Defendants violated Ind. Code § 24-4-23-10 by failing to implement a reasonable age verification method;

B. Permanently enjoining Defendants from violating Ind. Code § 24-4-23-10 and requiring Defendants to implement a reasonable age verification method for

its adult oriented websites;

C. Awarding Plaintiff civil penalties pursuant to Ind. Code § 24-4-23-15(2), payable to the State of Indiana through the Office of the Indiana Attorney General;

D. Ordering Defendants to pay the State's reasonable costs for the investigation and maintenance of this action pursuant Ind. Code § 24-4-23-15(3);

E. Finding that Defendant's actions are unfair, abusive, and deceptive to Indiana consumers under Ind. Code § 24-5-0.5, *et seq.*;

F. Permanently enjoin Defendants from continuing to engage in the unfair, abusive, and deceptive acts, omissions, and practices described herein;

G. Award Plaintiff civil penalties pursuant to Ind. Code § 24-5-0.5-4(g), payable to the State of Indiana through the Office of the Indiana Attorney General;

H. Ordering Defendants to pay the State's reasonable costs for the investigation and prosecution of this action pursuant to Ind. Code § 24-5-0.5-4(c)(4);

I. Granting any such further relief as the Court may deem appropriate.

JURY DEMAND

The State of Indiana demands a trial by jury pursuant to Indiana Trial Rule 38.

Respectfully submitted,

THEODORE E. ROKITA
Indiana Attorney General
Attorney No. 18857-49

Date: 12/03/2025

By: */s/ Joseph D. Deiser*

Joseph D. Deiser (#38832-49)

Douglas S. Swetnam (#15860-49)

Jennifer M. Van Dame (#32788-53)

Alyssa A. Rogers (#38328-29)

Jackson K. Yerkes (#38392-49)

Deputy Attorneys General

OFFICE OF THE INDIANA ATTORNEY GENERAL

Indiana Government Center South, 5th Floor

302 West Washington Street

Indianapolis, IN 46204-2770

Phone: (317) 232-0486

Douglas.Swetnam@atg.in.gov

Jennifer.VanDame@atg.in.gov

Alyssa.Rogers@atg.in.gov

Jackson.Yerkes@atg.in.gov

Joseph.Deiser@atg.in.gov